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 Attorney for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

|                         |   |                                 |
|-------------------------|---|---------------------------------|
| AMINA JOHNSON,          | ) | Case No.: 2:24-cv-02033-APG-EJY |
|                         | ) |                                 |
| Plaintiff,              | ) | <b>MOTION TO WAIVE THE</b>      |
|                         | ) | <b>PHYSICAL ATTENDANCE OF</b>   |
| vs.                     | ) | <b>GINGER MCCAULEY AT THE</b>   |
|                         | ) | <b>ENE</b>                      |
| GENERAL DYNAMICS        | ) |                                 |
| INFORMATION TECHNOLOGY, | ) |                                 |
|                         | ) |                                 |
| Defendant(s).           | ) |                                 |
|                         | ) |                                 |

Pursuant to the Court's Order Scheduling Early Neutral Evaluation (ECF No. 13), Defendant, General Dynamics Information Technology, hereby moves this Court for an order excusing Ginger McCauley, Staff Vice President and Associate General Counsel, from physical attendance at the February 7, 2025 ENE. If allowed by the Court, Ms. McCauley could participate in the ENE by Zoom.

Ms. McCauley is responsible for the oversight of this case. She lives and works in Virginia. Attendance at the ENE would entail two days of travel during the unpredictable Winter season. Further, Ms. McCauley recently replaced another employee (who retired) in the position and Ms. McCauley's prior position has not yet been filled (and is unlikely to be before the ENE). Thus, Ms. McCauley is currently the only in-house employment attorney for a company with 30,000 employees.

1 Additionally, Ms. McCauley has three minor children with activities scheduled for  
2 February 6-8, 2025.

3 Respectfully submitted,

4 FISHER & PHILLIPS, LLP

5  
6 By: /s/ Scott M. Mahoney, Esq.

7 Scott M. Mahoney  
8 300 South Fourth Street  
9 Suite 1500  
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Attorneys for Defendant

10 **CERTIFICATE OF SERVICE**

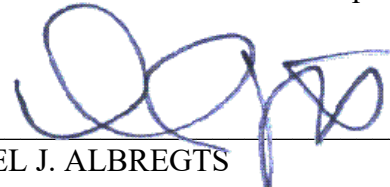
11 This is to certify that on the 14th day of January 2025, the undersigned, an  
12 employee of Fisher & Phillips LLP, electronically filed the foregoing Motion to Waive  
13 The Physical Attendance of Ginger McCauley at the ENE with the United States  
14 District Court, and a copy was electronically transmitted from the Court to the e-mail  
15 address for:  
16

17 Amina Johnson  
[johnsajj@gmail.com](mailto:johnsajj@gmail.com)

18  
19 By: /s/ Sarah J. Griffin

20 An employee of Fisher & Phillips LLP

21 IT IS THEREFORE ORDERED that the motion to waive physical attendance  
22 of Ginger McCauley at the Early Neutral Evaluation session (ECF No. 35) is  
23 GRANTED. The Court will send a videoconference link to counsel for Ms.  
24 McCauley to attend virtually. Ms. McCauley must attend the ENE by video,  
and not just by audio, and the Court expects the same decorum as it expects at  
in-person proceedings.

25  
26 

27 DANIEL J. ALBREGTS  
28 UNITED STATES MAGISTRATE JUDGE

DATED: January 16, 2025